

I support the Notice of Proposed Rule Making to allow AM stations to rebroadcast on FM translators.

The public interest will be better served by allowing AM stations to rebroadcast on FM translators. There are too many AM stations, especially in rural America that cannot adequately serve their communities in non-daylight hours due to severely limited coverage or daytime only status. The problem is most significant in the autumn and winter months. Many rural AM stations lose most if not all of their coverage from late afternoon through the early morning hours. Vital information such as local emergencies, school closings, local weather forecasts including severe weather warnings and local news cannot be heard in a very large area of stations regular listening area.

Other issues with AM radio's limited nighttime coverage affect the public interest. People listening to local news, public affairs programs, local sports and regular programming lose the ability to listen to the station's programming between sunset and sundown. After pattern and power change time for directional stations much of the public can no longer hear the programming they were listening to at the time of the change. AM stations are still the stations of choice for many senior citizens. Restrictions to the AM service do not serve the interest of this large segment of the public.

A 5000 watt AM station is as likely to suffer from interference as stations at lower power. Restricting the use of FM translators to daytime only stations or stations with licensed power of 2500 watts or less daytime and 500 watts or less nighttime power will not offer relief to other small market broadcasters with signals that have been restricted either by license or interference.

All AM stations should be allowed to rebroadcast programming on FM translators, not just AM daytime only stations. There are no solutions to the technical problems stated in the NPRM. Electromagnetic interference will only get worse. This interference is a problem that affects most AM radio stations at all hours of the day.

In today's world of 24 hour service from virtually every other audio service available to the public, AM stations with limited or no coverage in non-daylight hours have little chance to remain viable without the ability to broadcast 24 hours per day to as much of the station's coverage area as possible.

It is not practical to allow AM stations to broadcast on FM translators in non-daylight hours only. There is no other broadcast service that leaves the air and asks people to change the channel to continue to listen to a program. Allowing the public the ability to access their radio station of

choice on the same channel at all hours of the day and night provides the convenience to the public that all other audio and video services currently provide.

AM stations should be able to rebroadcast on FM translators within a 25 mile radius of their transmitter sites. Many AM stations licensed in the 1940s and 1950s do not have the coverage to serve the population that has migrated from the center of small cities, towns and boroughs to outlying areas. In other words, in many instances communities have outgrown the coverage of the local AM radio station. Because AM stations still provide more local news, talk and public affairs programs it is in the public interest of these communities to allow this programming to be heard.

There is no other broadcast service that serves the public interest of local communities better than AM radio stations. For example, on WCED-AM in DuBois, PA

Local talk programming has included extended talk segments with U.S. Congressman John Peterson, PA Senator Scarnati, PA State Representatives Surra and Smith, DuBois Mayor Suplizio, Clearfield and Jefferson, PA County Commissioners, Clearfield County District Attorney Shaw and Falls Creek Borough Manager Inzana. There is no other local media outlet that provides elected officials the opportunity to talk to and with the public like WCED. Allowing WCED to provide more people the opportunity to hear this type of programming is in the public interest.

It would be inappropriate to place limits on AM licensee's ability to use FM translators depending on ownership of FM stations in the same market as the AM station. AM stations provide different programming and most often serve different segments of the public than FM stations. This rule making should be about the ability of AM stations to serve the public, not station ownership limits.

Allowing AM stations to broadcast on FM translators should have no impact on any further development of LPFM stations. AM stations can operate on FM translators already licensed by the FCC. Since there is no new spectrum use needed this can be implemented immediately without any impact on existing FM or LPFM stations.

The following steps could then be taken regarding translators and LPFM:

- The FCC should proceed with the mutually exclusive translator applications frozen from the filing window in 2003. Many small and independent broadcasters spent thousands of dollars on engineering and

filing these applications in good faith and should be able to get resolution for the time, effort and expense dedicated to the window opened by the Commission. While some LPFM proponents may say that granting more FM translators may impede the opportunity for more LPFM stations, it should be noted that broadcasters filed these applications only because the FCC opened the window. All current and potential broadcasters should know that if they file in an FCC window that the resources put forth will be resolved as stated by the Commission at that time, and that the Commission intends to follow through to completion.

- After all previously filed translator applications have been acted upon the commission should make decisions regarding LPFM. Should more LPFM stations be granted they should be equal in preference to FM translators. In other words, no LPFM license shall be granted that will require a current FM translator station to leave the air nor will a new translator application require an LPFM to discontinue operation.

This is primarily a small market issue. In most major cities there is no spectrum remaining for translators or LPFM. In most small markets there may be enough spectrum for additional translators and LPFM stations should the FCC decide to move forward with more LPFM stations. The issue of allowing AM stations on FM translators does not have to affect any future decisions on LPFM.

Allowing AM stations to rebroadcast on FM stations, when considered on a public interest basis, has only benefits and no detriments. It is in the public interest for the Commission to fashion its rules and to grant authorizations so that the public, as much as possible, is able to listen to the radio stations the public wishes to listen to, when the public wishes to listen to them.

Respectfully submitted,

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